



October 7, 2022

**VIA ECF**

Hon. Gary R. Brown  
United States District Judge  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: *Giambalvo v Suffolk County* 22 Civ. 04778 (GRB)(ST)

Dear Judge Brown,

I represent the plaintiffs in the above-referenced matter.

I write in response to the Court's October 6, 2022 Order. The complaint as filed challenges the policies and procedures of the Suffolk County Police Department and does not challenge a state statute; however, the complaint may likely be amended before being served on the defendants to include constitutional challenge(s) to one or more state statutes.

If the complaint is amended to include a constitutional challenge to state statutes, Plaintiffs will file a notice of constitutional question as set forth in FRCP 5.1, serve such notice upon the New York State Attorney General, and file proof of service with the court.

Very truly yours,

*Amy L. Bellantoni*  
Amy L. Bellantoni